

VITAL RECORDS

- ◆ Vital records contain information that is essential to reestablishing or continuing an organization in the event of a disaster.
- ◆ Vital records are essential:
 - to continue Company operations,
 - to recreate the Company's legal and financial position, and
 - to preserve the rights of the Company, its employees, customers, and stockholders.
- ◆ Examples of Vital Records are: ledgers & journals, customer billings, mergers, articles of incorporation, patents/copyrights and stockholders registers, design/documentation.

DISASTER RECOVERY PLAN

Used in the salvaging of records of various media types (paper, CDs, diskette, tape, electronic, etc.) when disaster strikes.

- ◆ Focus of the plan is designed to:
 - minimize disruption of normal business operations
 - prevent further escalation of the disruption
 - minimize the economic impact of the disaster
 - establish alternative operating procedures
 - recover/salvage organizational assets
 - provide for rapid and smooth
 - train personnel with emergency procedures
- ◆ Each department responsible for Vital Records must have a Disaster Recovery Plan.
- ◆ The Plan must be provided to Records and Information Management.

WANT TO IMAGE YOUR RECORDS? ALREADY DOING SO?

- ◆ Is imaging a cost effective way to handle your records versus using off-site storage? If using off-site storage, you can have your records within 2 hours.
- ◆ Imaging systems should be used for day-to-day use and the need of quick retrieval, not for long-term storage.
- ◆ Originals of imaged documents need to be retained if the retention period is longer than 5 years; however, you must get written approval from RIM, Legal and Tax to destroy the originals after they have been imaged.
- ◆ If initiating an imaging system with your department, there may be IRS regulations or legal criteria that should be followed. RIM or the Tax department can provide a copy of the revenue procedures.
- ◆ A binder with the following data must be created and maintained on-site:
 1. A record of what you are imaging, where, when, and on what equipment any document was imaged will be maintained (to be retained in history format).
 2. An accurate chronological record of changes to the system. This must be maintained for as long as the system is running.
 3. Evidence of procedures ensuring quality, reliability and the integrity of the documents being imaged, including audit procedures.
 4. A list of MCI management personnel responsible for the supervision of the system (systems and record imaging). Provide names, dates, and titles. This needs to be updated when the "players" change.
 5. Documentation on the initial system, and any significant change to the system. Any major changes need to be discussed with the Tax department.
 6. A description of the optical platters used for storage, and location of where back-up copies will be maintained.
 7. Identify the location of records that are not or cannot be imaged.
 8. Procedures for retrieving records from imaging system.

MANAGER RESPONSIBILITIES

- ◆ All Managers' working files for employees should be sent to the HR Fileroom once an employee no longer works for the company or your department. If an employee transfers to another department, you should send any manager notes regarding the employee to the HR Fileroom. It is acceptable, however, to give the new manager the employee's attendance record, performance review and PAF, but you cannot give those notes or written comments that are about or concern the employee.
- The HR Fileroom is located at: 9835/700, 707 17th Street, Denver, Colorado 80202
- ◆ When an employee leaves the company, all files on his/her computer must be reviewed (including e-mail and e-mail attachments) for retention requirements under the Records Retention Schedule. The computer's records should be either retained or destroyed. Files that require retention must be pulled off the computer and stored appropriately. After this review, the computer's hard drive must be wiped clean of all records before being issued to a new user (even if this new user is in the same department).
- ◆ If a Manager receives a request from a terminated employee regarding getting copies of their travel and expense records or records contained within their personnel file, the Manager must refer the terminated employee to Law & Public Policy (LPP). No records or information may be given out to terminated employees (voluntary or involuntary) without prior approval from LPP.

RECORDS RETENTION SCHEDULE

(RRS)

- ◆ A tool that identifies those records requiring retention and their required retention period.
- ◆ The retention periods in the RRS are based on federal, state or local regulations and the company's operational needs.
- ◆ Retaining records longer than their legal or operational requirement exposes MCI to unnecessary financial and legal risk.
- ◆ MCI must avoid the perception that we are selectively disposing of records.
- ◆ Primary objective is for prompt disposal of records whose retention period has been met.
- ◆ Based on the company's functional areas and records common to those areas.
- ◆ Assigns each "type" of record its unique Record Series (RS) number. Determination, by the user, of the correct RS number is important in calculating the correct destruction review date.
- ◆ "Just in case" is not a consideration in retention. Individual departmental determinations do not supersede or replace the MCI Record Retention Schedule. Requested exceptions are submitted to RIM.



Record Retention

RECORDS MANAGEMENT COMPLIANCE AUDIT

Some factors for compliance:

- ◆ Are all employees aware of and in compliance with the retention program?
- ◆ Does the department recognize what a record is?
- ◆ Is the department reviewing and retaining their records, on-site & off-site, in accordance with the Record Retention Schedule?
- ◆ Is your department storing their records off-site properly?
- ◆ Can records be retrieved in a timely and efficient manner (off-site and on-site)?
- ◆ Does your department recognize that e-mail and anything downloaded from the internet are records?
- ◆ Is your department deleting e-mail and electronic data when operational need or legal retention requirements are surpassed?
- ◆ Does your department handle Vital Records?
- ◆ Does your department have a Disaster Recovery Plan?

If you want to make sure that your department is compliant with the Records Management Program before a formal audit is conducted, please call RIM.

OFF-SITE STORAGE



Off-Site

- ◆ All procedures associated with off-site storage are detailed on RIM's website.
- ◆ What you put into storage is your individual responsibility. If someone tells you to send something to storage (or retain it on-site) and you know it is against retention policy, you must challenge that request.
- ◆ All costs are paid by the RIM department, with the exception of:
 - Cartons returned to the submitter because of absence of inventory data.
 - Non-response to service request. You requested service from the storage vendor, but both you and your designated alternate point of contact were not present when the vendor's 'driver' arrived to deliver/pickup.
 - Rush orders.
- ◆ Any questions or problems that you have about off-site storage, contact RIM. Do not contact the storage vendor.
- ◆ Review the records you are planning to archive to ensure they have a retention requirement. Only those records should be placed in off-site storage.
 - No copies, working papers, drafts, miscellaneous manuals, stuff from past employee's office/desk (w/o review), no data in electronic form unless the associated software/hardware system is retained.
- ◆ Standard Storage & Climate-Control Storage.
 - Climate controlled storage is available for records retained on such media as microfiche, CD, tape, etc. You must indicate this type of storage to the vendor (on the MCI Inventory Form) when submitting the materials to storage.
- ◆ Only 'like' records can be put in to each storage carton.
 - Invoices separated from correspondence. They have different RS codes – have different retention requirements.

OFF-SITE STORAGE

continued

♦ **Completion of the MCI Inventory Form:**

- Use only the MCI Inventory Form (or the MCI Master Inventory Form), which can be downloaded from RIM's website.
- The storage vendor will refuse pick up if inventory forms are not with the cartons. With no exceptions.
- Complete every entry on the Inventory Form, except for the Retention Code.
- If entries are not completed correctly or clearly, retrieval of records will be very difficult and the proper retention period of the records may be jeopardized.
- Research the Record Classification Code (RS#) within the Record Retention Schedule. If you need any assistance, please contact RIM. It is imperative that you assign the correct RS# to ensure proper retention.
- Use a clear description; a description recognizable by anyone in the company. Do not use acronyms, the words – miscellaneous, completed, JJ Bean's desk, inactive records, etc.
- Complete the electronic request form, located on RIM's website, for pick-up of new storage. This form is directly e-mailed to RIM. In addition, you must fax a copy of your Inventory Form(s) to RIM for review. We will review the forms for completeness and clarity, to avoid problems in the future. Once the inventory form has been approved, RIM will forward your request for new storage pick-up to the storage vendor.
- Xerox a copy of the Inventory Form for your records. Put the original with the cartons for pick up.
- Do not complete Inventory Forms for someone else; for example, someone directs you to 'send these files to storage' – but they are records that you have never worked. It is the responsibility of the employee that maintains the records, to review those records and prepare the Inventory Form. If RIM, or LPP or Tax, needs to inquire about inventory data on records, we must speak to the individual with knowledge about the records.

OFF-SITE STORAGE

Continued

- ◆ Requests for retrieval and refile are done through RIM's website and transmitted directly to the storage vendor. Requests for new storage pick-up or supplies are transmitted to RIM via the request forms on RIM's website. Once new storage or supply orders have been reviewed and approved, RIM will forward the request to the storage vendor. The storage vendor will respond with a confirmation email, providing their delivery/pick-up date and a service order number.
- ◆ The vendor provides next-day service, if your order is received before 4pm.
- ◆ Following are the service requests available:
 - *"Storage Supply Requests"*: Storage supplies to include boxes and barcode labels. The Inventory Form requires a barcode number for each carton and a corresponding larger barcode label is affixed to the side of each carton. (only 1.2 cubic ft cartons are used. Contact RIM for exceptions.)
 - *"Electronic Box Retrieval Request Form"*: To request retrieval of a box from storage.
 - *"Electronic New Storage Pickup Form"*: To pick-up cartons that need to go to storage that have never been to storage.
 - *"Electronic Box Refile Form"*: To pick-up cartons previously retrieved from the storage vendor.
 - The *"HR File Request/Return Form"* is utilized only by the HR fileroom in Denver.
 - *"File Level Request/Return Form"*. This is used to request individual files from a carton. This can only be done if all of the files contained in the carton have been individually inventoried and identified, which would assign each file its own file id# in addition to the carton's barcode number. For further information on file-level inventory, contact RIM.

OFF-SITE STORAGE

Continued

◆ Other points.....

- When completing the request form on the website, make sure you indicate the “District” in the pull-down menu.
- You must provide a dept# (or an 8-digit dept name/abbrev)
- You must provide an “Alternate Contact Name” (point of contact). This is for the vendor’s driver. Make sure you tell your ‘alternate’ what service you requested, where the cartons are or what is expected to be delivered, and that the inventory forms are with the cartons.
- Do not contact the storage vendor via telephone or by any other means besides your service requests.
- MCI records will not be delivered to mailrooms or left on delivery docks under any circumstances. The storage vendor has been notified of this policy. Contact RIM for exceptions, to include strong justification.
- Cartons retrieved from storage may only be ‘outcarded’ for ten business days. RIM will notify you to return the carton(s) after this period or submit a justification to extend the retrieval time.

MCIWC031911

YOU MUST CONTACT RIM IF...

- ◆ You are storing active records.
- ◆ You need to retrieve records from off-site and reactivate them as active records on-site.
- ◆ If you are consolidating cartons of records stored off-site. The barcode numbers must be accounted for.
- ◆ If you have records stored off-site that have been identified for an audit or to be held due to a litigation. A retention hold code will be assigned to the carton.
- ◆ If you need to retain records retrieved from storage longer than 10 business days.
- ◆ If you have special requests regarding off-site storage.
- ◆ If you have questions or difficulties with services provided by the storage vendor or RIM.
- ◆ If you have questions regarding records, what type of media to use for storing records, you are moving to another location, the department is closed, or you find records stored in a self-storage facility or somewhere other than the office or Iron Mountain.



RIM is your source for any questions or directions pertaining to the maintenance, retention, storage and destruction of all MCI records.

RIM CONTACTS

Joe Stephens
Staff Assistant
Vnet 806-3401
Joe.W.Stephens@mci.com

Phil Hasselvander
Staff Assistant
Vnet 806-3398
Philip.H.Hasselvander@mci.com

Brenda Tate
Sr. Manager, Audit & Control
Vnet 806-3538
Brenda.Tate@mci.com

Charles McBride
Paralegal
Vnet 806-3831
Charles.McBride@mci.com

Joyce Moultry
Records Manager
Vnet 806-3336
Joyce.Moultry@mci.com

James Green
Record's Auditor
Vnet 806-3364
James.Green@mci.com

Darrell Daniels
Record's Compliance Specialist
Vnet 806-3378
Darrell.daniels@mci.com

Christopher Moses
Staff Assistant
Vnet 806-7117
Christopher.Moses@mci.com

Charles McBride
Para-Legal
Vnet 806-3831
Charles.McBride@mci.com

Michael Simms
Electronic Record's Specialist
Vnet 806-1252
Michael.L.Simms@mci.com

Records Management Program – Policies & Procedures

RIM's Website

<https://teamnet2.mcilink.com/departments/rim/>

**The following presentation was done for the
Accounts Payable department in early 2001.**



Records and Information Management

RECORDS COMPLIANCE PROGRAM

RIM's Website:

<https://teamnet2.mcilink.com/departments/rim/>

Points of Contact:

Daily record management activities and offsite storage:

Phil Hasselvander 1-703-886-3398 Chris Moses 1-703-886-7117

Mandatory Program

- ◆ The Company and its employees must adhere to all state, federal and operational record keeping requirements.
- ◆ All levels of management are held accountable for their department's compliance.
- ◆ Adherence to the Program and the requirements outlined in the Record Retention Schedule is mandatory, without exception
- ◆ Each department will be audited periodically for compliance.

Records & Information Management **Scope and Objectives**

- ◆ Oversee and assist with the daily record management and retention practices in MCI.
- ◆ Identify and Secure Vital Records...advise and educate on safeguards and retention requirements.
- ◆ Institute a Disaster Recovery Plan for all company records and information...business continuity in the event of a disaster.
- ◆ Ensure regulatory compliance...Federal/State mandates
- ◆ Minimize litigation risks...review records/information for retention requirements, identifying records that can be destroyed as soon as operational needs are met.
- ◆ Assist in identifying Operational Records and determining their required retention / destruction.
- ◆ Assimilate new records management technologies

A Record is...

A record is any information, regardless of medium or specific characteristics, created, received, used or distributed by MCI in the course of its business. This includes paper, microfilm, tape, microfiche, e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.



Only the *official copyholder* of a record is required to retain a record for the total retention period indicated in the RRS. If you maintain originals, you are the official copyholder. Creating a record does not mean you are the official copyholder; you must also maintain the original. Copies should not be stored or kept once your operational need is completed.



E-mail is just another form in which records/information is received.

- ◆ E-mail received or created in the course of business is an official record. It is the message within the e-mail that should be considered for retention, not who the message is from.
- ◆ The retention period is based on the content of the message. For example, an e-mail message between a MCI employee and a vendor must be retained for the time period specified for vendor correspondence.
- ◆ Keep in mind that, approximately, one percent or less of all e-mail sent or received has a true retention value. For internal e-mail messages, the sender has the obligation to follow any retention requirements, not the recipients. For e-mail messages coming from an external source, the recipient needs to either purge or retain pursuant to the Records Retention Schedule. Since a majority of e-mail has no retention requirement, all employees should be deleting e-mail once the retention requirement or operational need is complete. Operational need should not exceed one year from the receipt or sending the message.
- ◆ Specific company policy on e-mail, as written by Legal, can be located at: <https://teamnet2.mcilink.com/departments/lppgc/techlaw/>

Vital Records

- ◆ Vital records contain information that is essential to reestablishing or continuing an organization in the event of a disaster.
- ◆ Vital records are essential:
 - to continue Company operations,
 - to recreate the Company's legal and financial position, and
 - to preserve the rights of the Company, its employees, customers, and stockholders.
- ◆ Examples of Vital Records are: ledgers & journals, customer billings, mergers, articles of incorporation, patents/copyrights and stockholders registers, design/documentation.
- ◆ Each department responsible for Vital Records must have a Disaster Recovery Plan. Contact RIM for details. The Plan must be provided to Records and Information Management.

Manager Responsibilities

- ◆ All Managers' working files for employees should be sent to the HR Fileroom once an employee no longer works for the company or your department. If an employee transfers to another department, you should send any manager notes regarding the employee to the HR Fileroom. It is acceptable, however, to give the new manager the employee's attendance record, performance review and PAF, but you cannot give those notes or written comments that are about or concern the employee.

The HR Fileroom is located at: 9835/700, 707 17th Street, Denver, Colorado 80202

- ◆ When an employee leaves the company, all files on his/her computer must be reviewed (including e-mail and e-mail attachments) for retention requirements under the Records Retention Schedule. The computer's records should be either retained or destroyed. Files that require retention must be pulled off the computer and stored appropriately. After this review, the computer's hard drive must be wiped clean of all records before being issued to a new user (even if this new user is in the same department).
- ◆ If a Manager receives a request from a terminated employee regarding getting copies of their travel and expense records or records contained within their personnel file, the Manager must refer the terminated employee to Law & Public Policy (LPP). No records or information may be given out to terminated employees (voluntary or involuntary) without prior approval from LPP.

Records Retention Schedule **(RRS)**



Records Management Program – Policies & Procedures

- ◆ A tool that identifies those records requiring retention and their required retention period.
- ◆ Primary objective : prompt disposal of records whose retention period has ended.
- ◆ The retention periods in the RRS are based on federal, state or local regulations and the company's operational needs.
- ◆ Retaining records longer than their legal or operational requirement exposes MCI to unnecessary financial and legal risk.
- ◆ MCI must avoid the perception that we are selectively disposing of records.
- ◆ Created based on the company's functional areas and records common to those areas. However, do not restrict yourself to a particular functional area. Your department can handle Legal, Accounting or Tax records.
- ◆ Assigns each "type" of record its unique Record Series (RS) number. Determination, by the user, of the correct RS number is important in calculating the correct destruction review date.
- ◆ "Just in case" is not a consideration in retention. Individual departmental determinations do not supersede or replace the MCI Record Retention Schedule. Requested exceptions are submitted to RIM.

WORLD COM
Records Retention Schedule

PRIMARY CATEGORY : ACCOUNTING

Friday, January 05, 2007

Page 1

RS #	RECORD SERIES	DEFINITION	TOTAL (years)	COM
	1 ACCOUNTING	The management of receipts and expenditures, cost accounting and payroll, and the auditing of said functions.		
5	2 Audits	Audits of accounting records and/or procedures, including backup materials such as Internal Document Requests (IDRs).	C + 7	FA, V
	2 Cash			
12	3 Accruals	Information concerning cash forecast and related accounts, such as Cash Forecast Reports, Cash Accrual Reports, etc.	1	
11	3 Accumulation Accounts	Cash balance reports for WCOM bank accounts.	7	FA
13	3 Daily Cash Folders	Folders incorporating items such as Chase Concentration Report and Cash Report.	2	
	3 Flow			

MCIWC031920

A 03322

Off-Site Storage

- ◆ All procedures associated with off-site storage are detailed on RIM's website.
- ◆ What you put in to storage is your individual responsibility. If someone tells you to send something to storage (or retain it on-site) and you know it is against retention policy you must challenge that request.
- ◆ All costs are paid by the RIM department, with the exception of:
 - Cartons returned to the submitter because of absence of inventory data.
 - Non-response to service request. You requested service from the storage vendor, but both you and your designated alternate point of contact were not present when the vendor's 'driver' arrived to deliver/pickup.
 - Rush orders.
 - Special projects, such as large audit or litigation retrievals. Contact RIM.
- ◆ Any questions or problems that you have about off-site storage, contact RIM. Do not contact the storage vendor.
- ◆ Review the records you are planning to archive to ensure they have a required retention. Only those records will be placed in off-site storage.
 - No copies, working papers, drafts, misc manuals, stuff from past employee's office/desk (w/o review), no data in electronic form unless the associated software/hardware system is retained.
- ◆ Standard Storage & Climate-Control Storage.
 - Climate controlled storage is available for records retained on such media as microfiche, CD, tape, etc. You must indicate this type of storage to the vendor (on the MCI Inventory Form) when submitting the materials to storage.
- ◆ Only 'like' records can be put in to each storage carton.
 - Invoices separated from correspondence. They have different RS codes – have different retention requirements.
- ◆ Storage Vendor – Iron Mountain – For the Virginia/Washington DC/ Maryland area:
Account # MWLDK

Off-Site Storage

continued

◆ **Completion of the MCI Inventory Form:**

- Use only the MCI Inventory Form (or the MCI Master Inventory Form), which can be downloaded from RIM's website.
- The storage vendor will refuse pick up if inventory forms are not with the cartons. With no exceptions.
- Complete every entry on the Inventory Form, except for the Retention Code.
- If entries are not completed correctly or clearly, retrieval of records will be very difficult and the proper retention period of the records may be jeopardized.
- Research the Record Classification Code in Record Retention Schedule. If you need any assistance please contact RIM. It is most important to assign the correct RS# to ensure proper retention.
- Use a clear description; a description recognizable by anyone in the company. Do not use acronyms, the words – miscellaneous, completed, JJ Bean's desk, records (we know they are records) etc.
- Fax a copy of your Inventory Form(s) to RIM for review, especially if this is your first submittal of records to off-site storage. We will review the forms for completeness and clarity, to avoid problems in the future.
- Xerox a copy of the Inventory Form for your records. Put the original with the cartons for pick up.
- Do not complete Inventory Forms for someone else; for example, someone directs you to 'send these files to storage' – but they are records that you have never worked. It is the responsibility of the employee that maintains the records, to review those records and prepare the Inventory Form. If RIM, or LPP or Tax, needs to inquire about inventory data on records, we must speak to the individual with knowledge about the records.
- If there is missing data on the Inventory Forms, the storage will contact the submitter and request that the information be provided to them within five working days. If the vendor does not received the information the cartons will be returned to the submitter, with RIM's approval.

Off-Site Storage

Continued



◆ Requests for service from the storage vendor.

All requests for service to the storage vendor are done through RIM's website and transmitted to the vendor via email.

When you submit a request the vendor will respond with a confirmation email, providing their delivery date and a service order number.

The vendor provides next-day service, if your order is received before 4pm.

Following are the service requests available:

- *"Storage Supply Requests"*: Storage supplies to include boxes and barcode labels. The Inventory Form requires a barcode label for each carton listed and a corresponding larger barcode label is affixed to the side of each carton.
- *"Electronic Box Retrieval Request Form"*: To request retrieval of a box from storage.
 - *"Electronic Box Pickup Form"*: Dual use – to pickup new cartons for storage or pickup previously retrieved cartons for refile.
- The *"HR File Request/Return Form"* is utilized only by the HR fileroom in Denver.
 - *"File Level Request/Return Form"*. If all of the files contained in the carton have been individually inventoried and identified, each would be assigned its own file id# in addition to the carton's barcode number. For further information on file-level inventory, contact RIM.

◆ Other points.....

When completing the request form on the website, make sure you indicate the "District" in the pull-down menu.

- You must provide a dept# (or an 8-digit dept name/abbrev)
 - You must provide an "Alternate Contact Name" (point of contact). This is for the vendor's driver. Make sure you tell your 'alternate' what service you requested – where the cartons are or what is expected to be delivered – and that the inventory forms are with the cartons.
 - Do not contact the storage vendor via telephone or any other means besides your service requests.

MCI records will not be delivered to mailrooms or delivery docks under any circumstances. The storage vendor has been notified of this policy. Contact RIM for exceptions, to include strong justification.

- Cartons retrieved from storage may only be 'outcarded' for ten business day days. RIM will notify you to return the carton(s) after this period or submit a justification to extend the retrieval time.

You must contact RIM if...

- | You need to retrieve records from off-site and reactivate them as active records on-site.
- | If you are consolidating cartons of records stored off-site. The barcode numbers must be accounted for.
- | If you have records stored off-site that have been identified for an audit or to be held in a litigation, these records must have a hold code assigned to them.
- | If you have questions or difficulties with services provided by the storage vendor.

Repercussions of Noncompliance

- | Can you identify records retained and retrieve them in an expedient manner? Can other departments – such Legal or Tax identify your records? Remember, a clear, recognizable description assigned to records will assist in this process.
- | Have you retained only company information identified in the RRS? Do you understand the repercussions?
- | Are you reviewing all information received by or produced in your department / area?
 - Emails Computer hard drives HR records maintained by Managers
 - Information held on a server
- | Can you answer detailed questions from RIM, Legal or Tax reference the records you submitted to storage? Or were you told to retain records / information of which you have no working knowledge?

Records Management Program – Policies & Procedures



**Policies &
Procedures**

RIM is your source for any questions or directions pertaining to the maintenance, retention, storage and destruction of all MCI records.

....active records, on-site records, stored records.....

RIM's Website

<https://teamnet2.mcilink.com/departments/rim/>

<p align="center"><i>You must fax a copy of your completed Worldcom Box Inventory Form to RIM for review.</i></p> <p align="center">RIM Fax# : 703-341-9289</p> <p align="center">ALL ENTRIES ARE MANDATORY (except the Retention Code)</p>						
AGENCY	DATE	DEPT / COST CENTER	PHONE NO.	RIM APPROVAL		
103963	5/15/2001	9823	703-341-1234			
PREPARED BY		CITY / STATE	FAX NO.			
John Smith (the user of the records)		PCYII Arlington VA	703-341-4321			
STANDARD STORAGE	<input checked="" type="checkbox"/>	RECORD CLASSIFICATION CODE (RS#)	FROM (MO/DAY/YEAR)	THRU (MO/DAY/YEAR)	RETENTION CODE	
CLIMATE CONTROL STORAGE	<input type="checkbox"/>					
1	Carton Barcode # (place barcode label here) <i>Barcode labels are supplied by the storage vendor. Place the small label here, the corresponding large label goes on the side of the carton.</i>	RS 45	DATE RANGE	02/15/1999	02/28/1999	Use on approval by RIM
		CARTON DESCRIPTION : Vendor Invoices, Arco - Delmonico (55 CHARACTERS MAXIMUM) - Continue description, if needed -				
2	Carton Barcode # (place barcode label here)	RS 8	DATE RANGE	01/01/2000	01/31/2000	Use on approval by RIM
		CARTON DESCRIPTION : Cancelled checks, Bank of America, 145923 - 146005 (55 CHARACTERS MAXIMUM) - Continue description, if needed -				
3	Carton Barcode # (place barcode label here)	RS	DATE RANGE			
		CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM)				
4	Carton Barcode # (place barcode label here)	RS	DATE RANGE			
		CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM)				
5	Carton Barcode # (place barcode label here)	RS	DATE RANGE			
		CARTON DESCRIPTION : (55 CHARACTERS MAXIMUM)				

MCTWC031926

The following are questions compiled for training of
daily RIM personnel.

Records Management Program – Policies & Procedures

1. What is the RIM Program? What does it entail? What is RIM's goal and purpose?

The objectives of the Records Management Program are to ensure legal compliance, audit protection, access to valuable information, cost savings and orderly and efficient records life-cycle management.

RIM's main goal is to protect the company from any legal and financial risks by ensuring the safety and security of all company records. This is done in many ways; however, employee education and ensuring department compliance to the Program through audits are two ways.

2. What is a record?

The term "record" is defined as any and all recorded information (regardless of medium or specific characteristics) that is created, received, used or distributed by the Company in the course of business. This includes paper, microfilm, tape, microfiche, electronic e-mail, PC hard drives, mainframes, voice mail, optical, intranet and other mediums.

3. What is a Records Retention Schedule (RRS)? What do the columns mean?

The RRS is a tool – established and maintained by RIM - used by all MCI employees to determine the disposition and retention requirements of ALL records created, received, used, and distributed by MCI.

The columns are as follows:

RS # - The Record Series Number that uniquely identifies each type of record.

RECORD SERIES - A grouping of like records by classification/function.

DEFINITION - Used to describe a particular Record Series, may include sample document types.

TOTAL - The total length of time (number of years) that a Record Series must be retained.

Note: Retention periods are usually expressed as a number of years. Some retention periods are preceded by a letter. The letter is an abbreviation for a record occurrence (i.e., termination or completion of a contract). For example, C + 15 for a contract means that the contract needs to be retained for 15 years after the contract is canceled, completed, or closed.

COM - Comments concerning any unique retention requirements affecting a Record Series.

4. What is a vital record?

A vital record is the recorded information that is essential for the continuation or reconstruction of an organization. Vital records help establish the legal and financial position of MCI, and are critical to preserving the rights of the organization, its employees, customers and stockholders. Roughly two to six percent, of MCI's records are identified as "vital."

5. How do you send records to off-site storage?

First find out if they have all the supplies (boxes and barcode labels) that the user will need. If not, direct them to the website and the supplies request form. If yes, then find out if they have completed the Inventory Form. What types of records they are storing, do they know their record class code, what type of description they used, etc. If they don't know what their record class code is, work together to research it in the RRS, walk them through the RRS (i.e. do not restrict yourself to the 'function' of your department; do not satisfy yourself with an RS for reports; do not

Records Management Program – Policies & Procedures

choose an RS because you like the retention period). Don't forget to tell them that if their record type changes then their record class code will be different.

Explain the following process:

- a. Complete the Inventory Form (see instructions below).
- b. Make a copy of this form for your files. Give the original to the driver when they come to pick-up the boxes.
- c. Two identical peel-off, die cut, barcode labels are provided. Affix the small barcode label to the Inventory Form where indicated. This barcode number is your carton number. This is the number you will use to retrieve and refile your cartons.
- d. Affix the larger barcode label to the narrow side of the carton under the hold handle.
- e. Schedule a pick-up by completing the *Electronic Box Pick-Up Form* on the RIM website, or if they are in a district that requesting a pick-up through the website is not feasible, direct them to the Fax Order Form.

6. How do I get something out of storage or put something back into storage?

To retrieve cartons from storage, use the *Electronic Box Retrieval Request Form* on the RIM website or the Fax Order form depending on the storage district. You will need to indicate which carton numbers you want retrieved from storage and delivered to you. You may only retrieve records stored by your department. A department may not purge any records from a box that was retrieved from storage. Cartons that are retrieved must be returned to storage within 10 business days. For an exception to this policy, contact RIM with an explanation and justification for longer retention within the department.

To refile records with your storage vendor, use the *Electronic Box Pick-Up Form* on the RIM website or the Fax Order Form to schedule carton pick-ups. To add cartons to your pick-up order, you must prepare a new request form.

7. What storage vendors do we use? Besides Iron Mountain, where are the other vendors located?

MCI has approved off-site storage contracts with several different vendors. Iron Mountain is MCI's national vendor for off-site record storage. There are five other storage vendors: Kenwood Records Management, Cedar Rapids, IA; Storage Plus, Tulsa, OK; Mississippi Filing, Jackson, MS.; Datalok, Carson, CA and Recall Storage, San Leandro, CA

8. How do you complete an inventory form?

Circle either Standard Storage or Climate Control Storage at the top of the form. Do not mix electronic records with paper records. If you have both standard storage and climate control storage, you need to fill out a separate form for each type of storage.

- a. ACCT. #: Fill in the storage vendor account number for your area. See the Storage Vendor Telephone Directory or Contact List for account numbers in your area.
- b. PREPARED BY: Fill in your name (first & last).
- c. PHONE NO.: Fill in your outside telephone number here.
- d. DATE: Fill in the date the form is filled out.
- e. DEPT: Fill in your department name or four-digit department number. Location number is not needed.
- f. CARTON BARCODE: Place small die cut barcode label from the large barcode label sheet here.

Records Management Program – Policies & Procedures

- g. **RECORD CLASSIFICATION CODE:** Fill in the Record Series # from MCI's Records Retention Schedule.
- h. **DATE RANGE:** Fill in From and Thru dates of records in carton. For example, if a box contains invoices from June 1996 to September 1996, you should fill in the "From" field with 06/01/1996 and the "Thru" field with 09/30/1996. If you only have a year, then span the entire year (i.e., 01/01/96 to 12/31/96).
- i. **RETENTION CODE:** Leave blank, unless instructed otherwise by Records Management. You need to complete this field if you are storing active records, or records under litigation or audit; therefore, please call RIM for the code.
- j. **DESCRIPTION:** 55 characters of descriptive information that FULLY explains the records in the carton. The description should be able to identify, to anyone within the company, the contents of the carton.

IMPORTANT:

The Inventory form is used to identify carton contents and ownership. It is also used to input carton information into MCI's national database of records. All storage vendors have been instructed, by RIM, to refuse pick-up of new storage cartons without accompanying inventory forms. In addition, all storage vendors have been instructed to return any cartons with incomplete inventory forms. Unique abbreviations, acronyms, numbers without qualifiers, individuals' names, terms such as: miscellaneous files, general files, desk files, old files, office files are unacceptable. Cartons containing these types of descriptions will also be returned to you. All costs associated with returning cartons to you will be charged to your department.

9. When does a user utilize a fax order form? What districts use it?

A user would utilize the fax order form when requesting storage services from Storage Plus in Tulsa, and Iron Mountain in Austin, Cleveland, Dayton, Louisville, Miami, Minneapolis, Omaha, Philadelphia, San Antonio, Seattle, or St. Louis.

10. What is the cost for storing a box? What is the charge for retrieving or refiling a box?

The cost for storage is \$.165 per cubic foot per month. Regular next day retrieval or refile is \$1.30 per carton. Delivery is \$9.00 for the trip and \$1.00 per cubic foot.

11. Who pays for storage? Is my department ever charged? If so, how much?

RIM pays for all storage costs, except for RUSH retrievals. Rush retrievals will be charged back to the department. If you are charged back for a Rush, the charges are: \$40.00 for just saying the word Rush, \$2.20 per cubic foot, and \$4.25 for retrieving of each box.

12. How long should death certificates be retained?

RS540 states C+9; however, this is used only if the death certificate is submitted due to a claim against an employee's benefits. If the death certificate is submitted but not for a claim against an employee's benefits, then it should be placed within the employee's personnel file under RS384.

13. A user calls stating they have copies of contracts and wants to know if they have to keep them? What questions should be asked?

You should ask the user what types of contracts? How can they be sure they are copies? If after speaking with the user, you determine that they are, in fact, copies, then instruct the user that

Records Management Program – Policies & Procedures

they may destroy the records, but they have to be shredded. If they are originals, inform them of their retention requirements and let them know that they can place them in off-site storage.

14. How long does raw call data need to be retained? What questions should you ask?

Your first question should be what is raw call data? Raw call data is electronic data that comes in from the switch that is unreadable to the human eye. Raw call data indicates how long a customer was on the phone, who the customer is, what number was called, etc. This data needs to be retained for 3 years for legal purposes per LPP. The raw call data is then sent to a system that translates the data to readable form and then transports it to Billing.

15. I have old customer files that have met their retention, what do I do with them?

First verify the age of the records and determine if they have been retained for their required 3 year period. If they have, then inform the user they may destroy the records; however, they will need to be shredded.

16. A manager asks what she should do with her working personnel files. Can she throw them away? If not, can she throw away records that she knows are duplicates of what HR already has such as personnel requisitions and evaluations, etc.? Can she pass it onto the new manager if an employee transferred to another department?

Manager working personnel files must be sent to HR in Denver. If the employee is still employed by MCI but went to another department, the manager still must forward their working file to HR. The manager must not weed through the file and destroy anything. The manager may not give any information from the file to the new manager. The manager may only pass on leave information to the new manager. If the employee leaves the company, the same applies. The manager must forward the file to HR in Denver.

17. I have a bunch of files and we are moving tomorrow, but we're not taking them with us. What do I do with them?
What questions and actions should be taken?

What is your department? Where are you located? Why aren't you taking them with you? What types of files? What is the function of the records? After speaking with the user and you find that there is no retention requirements, then inform the user to destroy the records before they leave. If you conclude that there is a retention requirement, then you must insist that they take the records with them, to their new location, until they can put them into off-site storage properly. Explain to them the importance of retaining records properly and about the RIM Program, as well as the RRS and the company's liabilities if not followed. You should follow-up with facilities to ensure that the department actually did take the records with them and not leave them behind.

18. Iron Mountain calls because someone put the record classification code of RS755 and RS537 on their inventory forms and it doesn't show in their system. Do you give them a new record classification code for each? If so, what? If not, then what steps would you take.

Give Iron Mountain the new record classification code. For RS755 the record class code has been changed to RS522 and RS537 has been changed to RS285.

You then need to ask Iron Mountain who sent the boxes to storage. Call the user and inform them of the record class code change. You should also direct them to the RRS on RIM's website.

Records Management Program – Policies & Procedures

19. A user calls and states that they have design documentation. What questions would you ask to assist them in finding the correct record series #?

You should ask what type of design documentation they have. What are the designs for (i.e., software, hardware, facilities, etc.)? Is the documentation originals or copies? If they are originals, instruct them how to use the RRS on RIM's website and how to find the correct record class code. If the documentation is copies, instruct the user that they should purge the documentation once their operational need is completed. If the user indicates that even though they are copies, they are the only copies available to MCI, and then proceed with giving them a record class code form the RRS, as well as instructions on using off-site storage if they don't already know.

20. Records Management has boxes of records concerning the destruction of records along with approvals. What record series number would you assign to the boxes? What is the retention requirement?

RS153 for 10 years.

21. You receive a call from someone who states that they have boxes of records. The records belonged to the Executive VP of CS Wireless and they have to be retained. What do you say? How do you help this individual?

Start asking all the basic questions. What type of records do they have? What is the function of the record? Are the records copies or originals? The fact that the records belong to an Executive VP does not matter. If you ascertain that the records do have a retention requirement, educate the user on RIM's website including the RRS. Give them assistance in placing the records into off-site storage, if required.

If the records have no retention, inform the user that they should be purged. If the user insists that the Executive VP does not want to throw the records out, then you need to educate the user on the reasons for the RIM Program and the risks the company, as a whole, faces when individuals within the company are not compliant. Emphasize the 'individual employee responsibility' principle – no matter the wants/needs of managers. Offer to contact his/her Manager or the VP later if the Program is not being followed.

22. A user calls and states that they have original contracts and they want to place them in off-site storage. What do you say and do?

Ask the user what type of contracts they have and how they know they are originals? If the answer is satisfactory, then inform the user of the retention requirement and how they can find the information within the RRS on RIM's website. In addition, walk them through the procedures of acquiring supplies and how to send the records into off-site storage.

23. We need to store data tapes off-site. What questions should you ask?

Ask the user if they want to store data tapes off-site for long-term or on a rotational basis. What's on the tapes? How many? If rotating, how often and how many?

The answers to the questions above will determine what you answer will be. If the department needs to store inactive data tapes that need to be retained until their retention has been met, then inform them about off-site storage, specifically vault storage and the type of box or tub needed.